

1 SIGAL CHATTAH
2 United States Attorney
3 District of Nevada
4 Nevada Bar Number 8264
5 MELANEE SMITH
6 STEVEN J. ROSE
7 Nevada Bar Number 13575
8 Assistant United States Attorneys
9 501 Las Vegas Boulevard South, Suite 1100
10 Las Vegas, Nevada 89101
11 (702) 388-6336
12 Melanee.Smith@usdoj.gov
13 Steven.Rose@usdoj.gov

14 DAVID L. JAFFE
15 Chief, Violent Crime and Racketeering Section
16 U.S. Department of Justice
17 JUSTIN BISH
18 CHRISTOPHER O. TAYLOR
19 Trial Attorneys
20 Violent Crime and Racketeering Section
21 U.S. Department of Justice
22 Justin.Bish@usdoj.gov
23 Christopher.Taylor2@usdoj.gov
24 *Attorneys for the United States*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 vs.
19 JOSE LUIS REYNALDO REYES-CASTILLO,
20 a/k/a "Molesto,"
21 DAVID ARTURO PEREZ-MANCHAME,
22 a/k/a "Walter Melendez,"
a/k/a "Herbi," a/k/a "Catracho,"
JOEL VARGAS-ESCOBAR,
a/k/a "Momia," and
ALEXANDER DE JESUS FIGUEROA-TORRES,
Defendants.

24 Case No. 2:19-cr-00103-GMN-MDC

**Government's Supplement to Motion
in Limine at ECF No. 251¹**

¹ Certification: This supplement is timely filed. *See* ECF No. 275.

1 On April 2, 2024, the undersigned met and conferred with counsel for each of the
2 defendants regarding the government's Motion in Limine filed under seal at ECF No. 251.
3 During the meeting, counsel for defendants indicated they agreed with, and were opposed to,
4 portions of the government's motion but did not divulge which portions they agreed with or
5 were opposed to. The undersigned has had an opportunity to review the defendants' response
6 to the government's motion in limine and don't oppose their position.

7

8

DATED: April 4, 2025

9

10

SIGAL CHATTAH
United States Attorney

11

12

13

/s/Melanee Smith

/s/Steven Rose _____

MELANEE SMITH

STEVEN ROSE

Assistant U.S. Attorneys

14

15

16

17

18

19

20

21

22

23

24

DAVID L. JAFFE

Chief, Violent Crime and Racketeering Section

/s/Justin Bish

/s/Christopher Taylor _____

JUSTIN BISH

CHRISTOPHER TAYLOR

Trial Attorneys

Violent Crime and Racketeering Section

U.S. Department of Justice